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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LATAM Airlines Group S.A., *et al.*,

Debtors.¹

Chapter 11

Case No.: 20-11254 (JLG)

Jointly Administered

**Related Docket No. 2756, 3193, 3343 &
3401**

**THIRD NOTICE OF ADJOURNMENT OF DEBTORS' TWENTY-
NINTH OMNIBUS OBJECTION (SUBSTANTIVE) TO CERTAIN CLAIMS
FILED BY UNIONS PURSUANT TO 11 U.S.C. 502(B)(1) AND FED. R. BANKR.
P. 3007 (NO LIABILITY) SOLELY WITH RESPECT TO CLAIM NOS. 1242 & 1243**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: LATAM Airlines Group S.A. (59-2605885); Lan Cargo S.A. (98-0058786); Transporte Aéreo S.A. (96-9512807); Inversiones Lan S.A. (96-5758100); Technical Training LATAM S.A. (96-847880K); LATAM Travel Chile II S.A. (76-2628945); Lan Pax Group S.A. (96-9696800); Fast Air Almacenes de Carga S.A. (96-6315202); Línea Aérea Carguera de Colombia S.A. (26-4065780); Aerovías de Integración Regional S.A. (98-0640393); LATAM Finance Ltd. (N/A); LATAM-Airlines Ecuador S.A. (98-0383677); Professional Airline Cargo Services, LLC (35-2639894); Cargo Handling Airport Services LLC (30-1133972); Maintenance Service Experts LLC (30-1130248); Lan Cargo Repair Station LLC (83-0460010); Prime Airport Services, Inc. (59-1934486); Professional Airline Maintenance Services LLC (37-1910216); Connecta Corporation (20-5157324); Peuco Finance Ltd. (N/A); LATAM Airlines Perú S.A. (52-2195500); Inversiones Aéreas S.A. (N/A); Holdco Colombia II SpA (76-9310053); Holdco Colombia I SpA (76-9336885); Holdco Ecuador S.A. (76-3884082); Lan Cargo Inversiones S.A. (96-9696908); Lan Cargo Overseas Ltd. (85-7752959); Mas Investment Ltd. (85-7753009); Professional Airlines Services Inc. (65-0623014); Piquero Leasing Limited (N/A); TAM S.A. (N/A); TAM Linhas Aéreas S.A. (65-0773334); ABSA Aerolinhas Brasileiras S.A. (98-0177579); Prismah Fidelidade Ltda. (N/A); Fidelidade Viagens e Turismo S.A. (27-2563952); TP Franchising Ltda. (N/A); Holdco I S.A. (76-1530348) and Multiplus Corretora de Seguros Ltda. (N/A). For the purpose of these Chapter 11 Cases, the service address for the Debtors is: 6500 NW 22nd Street Miami, FL 33131.

PLEASE TAKE NOTICE that, on or about November 9, 2020, Sindicato de Trabajadores de Lan Chile S.A. filed proof of claim number 1242 in these proceedings (“Claim No. 1242”).

PLEASE TAKE FURTHER NOTICE that, on or about November 9, 2020, Sindicato Nacional de Tripulantes de Cabina de la Empresa LATAM Airlines Group S.A. (“STCLA”) filed proof of claim number 1243 in these proceedings (“Claim No. 1243”).

PLEASE TAKE FURTHER NOTICE that, on or about December 17, 2020, Sindicato de Empresa de Pilotos LATAM Airlines Group S.A. (“SDP”) filed proof of claim number 2266 in these proceedings (“Claim No. 2266” and, together with Claim No. 1242 and Claim No. 1243, the “Remaining Claims”).

PLEASE TAKE FURTHER NOTICE that, on or about December 17, 2020, Sindicato de Tripulantes de Cabina Transporte Aereo filed proof of claim number 2346 in these proceedings (“Claim No. 2346”).

PLEASE TAKE FURTHER NOTICE that, on July 20, 2021, the Debtors filed the *Debtors’ Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 (No Liability)* (ECF No. 2756) (the “Objection”), which requested that the Remaining Claims and Claim No. 2346 be expunged and disallowed in full.

PLEASE TAKE FURTHER NOTICE that, on August 19, 2021, STCLA sent a response to the Objection to the Debtors and Chambers. On August 20, 2021, STCLA filed a response to the Objection (ECF No. 2971).

PLEASE TAKE FURTHER NOTICE that, on August 20, 2021, the Debtors adjourned without prejudice the Objection sole with respect to the Remaining Claims to the September 23, 2021 Omnibus Hearing (ECF No. 2972).

PLEASE TAKE FURTHER NOTICE that, on August 30, 2021, the Bankruptcy Court for the Southern District of New York sustained the Objection with respect to Claim No. 2346, and Claim No. 2346 has been expunged and disallowed in full (ECF No. 3040).

PLEASE TAKE FURTHER NOTICE that, on September 1, 2021, SDP filed a response to the Objection (ECF No. 3127).

PLEASE TAKE FURTHER NOTICE that, on September 14, 2021, the Debtors adjourned without prejudice the Objection sole with respect to the Remaining Claims to the October 28, 2021 Omnibus Hearing (ECF No. 3193).

PLEASE TAKE FURTHER NOTICE that, on October 14, the Debtors submitted the *Stipulation By and Between the Debtors and Sindicato de Empresa de Pilotos de LATAM Airlines Regarding the Debtors’ Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions to 11 U.S.C. § 502(b)(1) and Fed. R. Bankr. P. 3007 Solely with*

Respect to Claim No. 2266 (the “Stipulation”) (ECF No. 3343). The Bankruptcy Court entered the Stipulation on October 22, 2021 (ECF No. 3401).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation, Claim No. 2266 is adjourned *sine die*, and upon a final, non-appealable decision in case number RIT T-725-2020, of the First Labor Court of Santiago, any party to the Objection can re-establish a hearing date on the Objection for either a previously scheduled omnibus hearing or another date as may be approved by the Bankruptcy Court, provided that the party seeking to reestablish such hearing gives the other parties to the Objection at least 30 days’ notice. Following such notice, the Debtors will re-notice the hearing on the Objection. The Debtors’ reply with respect to the responses shall be filed and served one week before the re-noticed hearing (the foregoing terms, collectively, the “Stipulation Terms”).

PLEASE TAKE FURTHER NOTICE that, on October 25, 2021, STCLA filed additional documents in further support of its response to the Objection (ECF No. 3410).

PLEASE TAKE FURTHER NOTICE that the Debtors hereby adjourn, pursuant to direction from Chambers, without prejudice the Objection, solely with respect to Claim No. 1243, to the November 30, 2021 Omnibus Hearing. The deadline for the Debtors to file replies, if any, will be November 23, 2021 at 4:00 p.m. (prevailing eastern time).

PLEASE TAKE FURTHER NOTICE that the Debtors hereby adjourn, pursuant to direction from Chambers, without prejudice the Objection, solely with respect to Claim No. 1242 *sine die* on the same terms as the Stipulation Terms.

Dated: October 26, 2021
New York, New York

/s/ Luke A. Barefoot
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